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Attorney for Debtors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH
Central Division**

In Re:

Case No. 16-23942

BEVERLY VALENCIA

Chapter 13

Debtors.

Judge Kevin R. Anderson

**MOTION TO VACATE DISMISSAL AND REINSTATE CHAPTER 13, RESCHEDULE
CONFIRMATION HEARING, AND REQUEST FOR ATTORNEY FEES AND COSTS**

(Objection Deadline: October 3, 2016)

PLEASE TAKE NOTICE that Debtor, through counsel undersigned, has filed with the United States Bankruptcy Court for the District of Utah, a Motion to Vacate Dismissal Pursuant to Fed.R.Civ.P 60(B) and Bankruptcy Rule 9024 (“Motion”).

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW.

If you do not want the Court to grant the relief requested in the Motion, then you or your attorney must:

(1) on or before **October 3, 2016**, file with the Bankruptcy Court a written Objection, explaining your position at:

United States Bankruptcy Court
350 South Main Street, Room 301
Salt Lake City, UT 84101

If you mail your objection to the Bankruptcy Court for filing you must mail it early enough so that the Court will **receive** it on or before **October 3, 2016**. You must also mail a copy to the undersigned counsel at Vannova Legal, PLLC, 47 West 9000 South #1, Sandy UT 84070.

(2) attend a hearing on **October 17, 2016 at 1:30 PM in Courtroom 376**, United States Bankruptcy Court, 350 South Main Street, Salt Lake City, UT 84111. **There will be no further notice of the hearing** and failure to attend the hearing will be deemed a waiver of your objection.

If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion to Vacate Dismissal and may enter an order granting that relief. In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to enter an order approving the Motion to Vacate Dismissal without hearing.

DATED: September 16, 2016.

/s/ Matthew K. Broadbent

Attorney for Debtors

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **NOTICE AND MOTION TO VACATE DISMISSAL PURSUANT TO FED.R.CIV.P. 60(B) AND BANKRUPTCY RULE 9024** was served by ECF (as noted below), or addressed to the following persons, deposited in the U.S. mail, first class, postage fully pre-paid on August 17, 2016 to the following:

US Trustee

United States Trustee
(By ECF)

Trustee

Lon A. Jenkins
Chapter 13 Trustee
(By ECF)

Creditors

Attached Mailing Matrix
(By U.S. Mail)

/s/ Jenny Leato

Atlas Acquisitions LLC

294 Union St.

Hackensack, NJ 07601-4303

Bonneville Billing & Collections, Inc.

PO Box 150621

Ogden, UT 84415-0621

Matthew K. Broadbent

Vannova Legal, PLLC

47 West 9000 South #1

Sandy, UT 84070-2043

Callaway Apartments

C/O KIRK CULLIMORE

644 E UNION SQUARE

SANDY, UT 84070-3403

Clear Management Solutions

PO Box 26415

Salt Lake City, UT 84126-0415

Crest Financial, inc.

61 W 13490 S

Draper, UT 84020-7209

Dr Calvins Clinic

3800 3500 S

Salt Lake City, UT 84120-3306

E Partner Net

740 E 1910 S

Provo, UT 84606

Eagle's Landing Apartments

625 Redwood Rd

Salt Lake City, UT 84104-3618

Emergency Physicians Integrated Care

144 S 500 E

Salt Lake City, UT 84102-1907

Express Recovery Services

Po Box 26415

Salt Lake City, UT 84126-0415

Thomas E. Goodwin

Parr Brown Gee & Loveless

101 South 200 East

Suite 700

Salt Lake City, UT 84111-3105

Granger Medical Clinic

3181 W 9000 S

West Jordan, UT 84088-5610

Green Light Auto Solutions

Tito's Auto Sales

4740 S State St

Salt Lake City, UT 84107-3839

HLS of Nevada, LLC

Nevada West Financial

7625 Dean Martin Drive

Las Vegas NV 89139-5974

Iasis/Jordan Valley Hospital

3580 West 9000 South

West Jordan, UT 84088-8899

Intermountain Health Care, Inc.

P.O. Box 27808

Salt Lake City UT 84127-0808

Intermountain Healthcare

PO Box 27808

Salt Lake City, Utah 84127-0808

Lon Jenkins tr

405 South Main Street

Suite 600

Salt Lake City, UT 84111-3408

Jiffy Lube / Lube management Corporation

7430 Creek Rd

Sandy, UT 84093-6158

Johnson Mark LLC

4246 S Riverboat Rd Ste

Salt Lake City, UT 84123-2587

Jordan Valley Medical Center

Camie Snowden

406 W. South Jordan Parkway, Ste. 300

South Jordan, Utah 84095-3956

Ken Garff

4175 W 3500 S

Salt Lake City, UT 84120-3203

KeyBank N.A.

4910 Tiedeman Road

Brooklyn, OH 44144-2338

Link Debt Recovery

9176 S 300 W

Sandy, UT 84070-2668

Money Tree Finance

C/o Security Finance

Spartanburg, SC 29304

Mountain America Credit Union

735 S. State St. 3rd Floor

Salt Lake City, UT 84111-3821

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Mountain Land Collections, Inc.
Law Offices of Quinn M Kofford
PO Box 1425
American Fork UT 84003-6425

Mountain Loan Centers, Inc.
Attn: Bankruptcy
PO Box 3000
Anaheim, CA 92803-3000

Mountain Medical Physician Specialist
Dept 340
PO Box 20015
Salt Lake City, UT 84130

N.A.R. Inc.
PO BOX 271014
SALT LAKE CITY, UT 84127-1014

North American Recovery
NAR Inc
PO Box 271014
Salt Lake City, UT 84127-1014

Office Recovery Services
PO Box 45033
Salt Lake City, UT 84145-0033

Outsource Receivables Management
372 24th St Ste 300
Ogden, UT 84401-1438

Pediatric Anesthesiologists, Inc.
100 Mario Capecchi Dr
Salt Lake City, UT 84132-0001

SFC Central Bankruptcy
PO Box 1893
Spartanburg, SC 29304-1893

Solucion Hispana
1321 East 3300 South #19
Salt Lake City, UT 84106-3015

United States Trustee
Ken Garff Bldg.
405 South Main Street
Suite 300
Salt Lake City, UT 84111-3402

University Health Care
127 South 500 East, Ste. 420
Salt Lake City, Utah 84102-1979

University of Utah Healthcare
PO Box 413064
Salt Lake City, UT 84141-3064

Utah Department of Workforce Services
480 27th St
Ogden, UT 84401-4202

Utah State Tax Commission
Attn Bankruptcy Unit
210 North 1950 West
Salt Lake City, UT 84134-9000

Beverly V. Valencia
657 S Redwood Rd #1205
Salt Lake City, UT 84104-3643

Western Anesthesia Associates, LLC
PO Box 3810
Salt Lake City, UT 84110-3810

(p)ZIONS FIRST NATIONAL BANK
LEGAL SERVICES UT ZB11 0877
P O BOX 30709
SALT LAKE CITY UT 84130-0709

Gale K. x3Francis
Office of the Attorney General
160 East 300 South
Fifth Floor
P.O. Box 140874
Salt Lake City, UT 84114-0874

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Zions Bank
PO Box 1507
Salt Lake City, UT 84110-1507

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Jack Tracy

End of Label Matrix
Mailable recipients 48
Bypassed recipients 4
Total 52